

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,		: No. 07 Civ. 9235 (CSH)
		:
Plaintiff,		: ECF Case
		:
v.		:
		: REPLY DECLARATION OF
		: MARC J. GOTTRIDGE IN
		: FURTHER SUPPORT OF
		: DEFENDANT LLOYDS TSB
LLOYDS TSB BANK PLC,		: BANK PLC'S MOTION TO
Defendant.		: <u>DISMISS THE COMPLAINT</u>
		:
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Marc J. Gottridge declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner in Lovells LLP, attorneys for defendant Lloyds TSB Bank plc ("Lloyds TSB") in the above-captioned action. I am a member in good standing of the Bar of the State of New York and of this Court.

2. I submit this reply declaration in further support of Lloyds TSB's motion to dismiss the Complaint (the "Motion").

3. The purpose of this declaration is to place before the Court copies of certain documents cited in the accompanying reply memorandum of law in further support of the Motion, as described below.

4. Annexed hereto as Exhibit 1 is a true and correct copy of a criminal complaint (without exhibits), dated July 7, 2004, submitted by Joseph P. LaSala and Fred S. Zeidman as Trustees of the AremisSoft Corporation Liquidating Trust (the "Trustees") to the Prosecutor General of Switzerland, alleging violations by Lycourgos Kyprianou and others of (*inter alia*) the Swiss money laundering statutes, as provided to me by a lawyer in Switzerland (the "Swiss Criminal Complaint"). In the action commenced by the Trustees against Lloyds TSB in this

Court, No. 06 Civ. 4335 (CSH), which the Court dismissed on *forum non conveniens* grounds, the Trustees did not disclose the Swiss Criminal Complaint, and Lloyd TSB only recently obtained a copy of it.

5. Annexed hereto as Exhibit 2 is a true and correct copy of a translation of the Swiss Criminal Complaint, from French to English, together with a certification thereof.

6. Annexed hereto as Exhibit 3 is a true and correct copy of the indictment in *United States v. Bodmer*, No. 03 Cr. 947 (SAS) (S.D.N.Y., filed August 5, 2003) as obtained from the files of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 13, 2008 at New York, New York.

A handwritten signature in black ink, appearing to read "Marc J. Gottridge", with a long horizontal flourish extending to the right.

MARC J. GOTTRIDGE